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ATTORNEYS FOR DEBTOR

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

**IN RE:**

**ELECTROTEK CORPORATION,**

**Debtor.**

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**CASE NO. 21-30409-MVL  
CHAPTER 11**

**DEBTOR'S OBJECTION TO EMERGENCY MOTION FOR EXTENSION  
OF TIME AND CONTINUANCES REGARDING DEBTOR'S  
CHAPTER 11 PLAN OF REORGANIZATION**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW Electrotek Corporation, Debtor in the above entitled and numbered case ("Debtor"), and files this its Debtor's Objection to Emergency Motion for Extension of Time and Continuances Regarding Debtor's Chapter 11 Plan of Reorganization, and in support thereof show:

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A).

2. On March 8, 2021, Debtor filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the above-captioned case.

3. On June 24, 2021, the Court entered its *Order Approving Disclosure Statement [Docket No. 47]*. The Debtor served out the Plan, Disclosure Statement and Ballots on all creditors

in this case on June 29, 2021. Based on the Ballots received to date, Debtor believes its Plan will be consented to by the impaired Classes of Claims voting on the Plan.

4. Recently the Office of the U.S. Trustee appointed an Unsecured Creditors Committee in the case. They have retained counsel that has represented one of the unsecured creditors on the committee since the filing of this case. Some of the pertinent documents were previously provided to such counsel by the Debtor at their request.

5. The Committee's counsel has requested further documents which the Debtor has collected and will be sending to them. They have also raised the possibility of objecting to the Plan, doing discovery, asserting claims in the case and taking a very aggressive role in this case.

6. This case is currently set for confirmation on August 6, 2021.

7. The Debtor was ready to move forward with its Plan in this case and is hesitant to see that process delayed.

WHEREFORE, PREMISES CONSIDERED, Debtor respectfully prays that the Court enter an Order denying the Motion, and for such other and further relief to which Debtor may show itself to be justly entitled.

Dated: July 26, 2021.

Respectfully Submitted,

/s/ Joyce W. Lindauer

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 26, 2021, a true and correct copy of the foregoing document was served via email pursuant to the Court's ECF system upon the parties receiving electronic notice in this case listed below.

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